



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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313405

VIA CERTIFIED MAIL 7000 0520 0023 9040 8150

December 31, 2002

Mr. Mike Smith
Miller Plating & Metal Finishing, Inc.
PO Box 6075
3200 North 6th Avenue
Evansville, Indiana 47719-0075

Re: Inspection Summary Letter

Miller Plating & Metal Finishing, Inc.
IND0606365983
Evansville Vanderburgh County

Dear Mr. Smith:

On November 14 and 18, 2002, a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Miller Plating & Metal Finishing, Inc. located at 3200 North 6th Avenue, Evansville, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection: ☒ Complete Industrial Waste Inspection
☐ Limited Industrial Waste Inspection
☐ Complaint
☐ Other _____

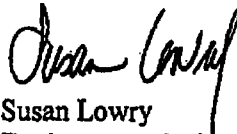
Results of Inspection: ☐ No violations were observed
☐ Violations were observed but corrected during the inspection. See inspection report.
☐ Violations were observed. See inspection report.
☐ Additional information/review is required to evaluate overall compliance.
☒ Violations were observed and will be referred to the Office of Enforcement. See inspection report.



Miller Plating & Metal Finishing, Inc.
Inspection Results
Page 2

Please direct any response to this letter and any questions to me at 317/308-3117.

Sincerely,



Susan Lowry
Environmental Manager
Industrial Waste Compliance Section
Compliance and Response Branch

Enclosure

cc: Vanderburgh County Health Department



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**INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
INDUSTRIAL/HAZARDOUS WASTE
INSPECTION REPORT**

Facility Name: Miller Plating & Metal Finishing, Inc.			
EPA Identification Number: IND006365985			
Location: 3200 North 6 th Avenue			
City: Evansville	County: Vanderburgh	Zip Code: 47719-0075	
Inspector: Susan Lowry	Inspection Date: November 14 th and 18 th , 2002		
Other IDEM Representatives: John Naddy (November 18 th)			
Primary contact during inspection: Mike Smith			

A. Pre-Inspection File Review
Notification Information: Notified as a Large Quantity Generator of D002 F006 F007 F008 F009, September 1997
Part B Permitted Units/Issuance Date: NA
Part B Permit Reviewed by Inspector: Date
Interim Status Units: NA
Post Closure Units: NA
Waste Classification/Expiration Date: NA
Previous Inspections: Full RCRA inspection- February 10 th and 11 th , 2000
Unresolved violations/comments: The February 2000 inspection resulted in the following violations being cited: waste determination/unidentified wastes, container labeling, start of accumulation dates, greater than 90 day storage, open containers/poor condition, contingency plan/local authorities, lack of inspections in container storage area. An Agreed Order was adopted on September 11, 2000 and the facility returned to compliance on April 16, 2001.

B. Inspection Findings
I. Facility Description and Processes Inspected
Miller Plating & Metal Finishing, Inc. is a plating "job shop", plating various electronics parts for the communication industry. Nickel, silver, and copper are the metals typically used for plating. Zinc is used for adhesion. Some chrome is used for conversion coating or etching. There are four plating lines that run continuously, and two additional lines used as needed.

II. Regulatory Status/Activity
Large Quantity Generator of hazardous waste. Small Quantity Handler of universal waste.

III. Hazardous and Universal Waste Streams Noted During Inspection			
EPA #/ Description	Source	Generation Rate	Disposition
Fluorescent lamps	Spent material	Undetermined	Safety Kleen
Filtercake- F006	Caustic/corrosive wastewater treatment	20 yd ³ / month	Heritage Environmental IND093219012
Unable to determine other hazardous waste streams and generation rate at time of inspection			

IV.	Exempted/Excluded Hazardous Waste Streams and Reason
Waste caustics/corrosives are neutralized on site, and exempt per 261.5	

V.	Transporters
Heritage Transport LLC IND058484114 BFI	

VI.	Non-Hazardous Wastes Noted During Inspection		
	Description	Source	Generation Rate
	Solid waste, plastic, pallets	Various processes	Not inspected
			Disposition
			BFI/Waste Services of Evansville

VII.	Container Management Area(s) (including Used Oil) Inspected		
	<90(180) Day Accumulation Description of unit	<90(180) Day Accumulation Description of unit	<90(180) Day Accumulation Description of unit
	Location: See Attachment A	Location: NA	Location: NA
	Waste Code #/Size of Containers	Waste code #/Size of Containers	Waste Code #/Size of Containers
	See Attachment A		

VIII.	Satellite Accumulation Area(s) Inspected/ Universal Waste Accumulation Area(s) Inspected		
	Location	Waste Code(s)/Process	Comments
	Boiler Room	Fluorescent lamps	Not labeled

IX.	Hazardous Waste/Used Oil Tanks Inspected		
	Waste Codes/Location	Type/Construction	Size
	None		
			Quantity On-Site

X.	Other Regulated Unit(s) (i.e. Containment Building, Waste Piles, Restricted Waste Sites, etc.) Inspected		
	Waste Codes/Location	Type/Construction	Size
	None		
			Quantity On-Site

XI.	Inspection Summary: (Description of facility walkthrough, observed permitted units, record review and post-interview)
	<p>On November 14th, the facility's environmental contact was not available. The IDEM inspector viewed the wastewater treatment area and the container storage area, and opted to return the following week when the environmental contact had returned.</p> <p>On November 18th, John Naddy of the Department's Technical Compliance Section accompanied the original inspector for the return visit and full inspection. In the three days between visits, several of the hazardous waste drums were moved inside. IDEM staff toured the facility and reviewed applicable LQG paperwork requirements, as available.</p> <p>During the inspection, these observations were noted and discussed with facility personnel:</p> <ol style="list-style-type: none"> 1. Hazardous waste labels are used on various containers. When the contents are not a hazardous waste, the words "hazardous waste" are to be cut from the label. This practice lends itself to confusion and a greater likelihood of containers being mislabeled. 2. The majority of the hazardous waste labels on containers in the accumulation areas appears to have had the date marked over. Writing over the month presents a variety of potential problems. First, the date is often no longer legible (and thus out of compliance). Second, the accuracy of the date is questionable since only the month is changed. This allows for a possible variation of up to thirty days, which may or may not favor the generator. Third, one could question whether the container was actually emptied and refilled, or if the label was altered to comply with the 90-day limit. 3. There is no apparent standard for labeling or identifying the contents of their hazardous waste containers. Some labels have complete information, others have none. If there is a waste code listed, it is "F006" regardless of the contents of the drum. Again, this is a practice that leads to confusion and non-compliance. <p>Along with the aforementioned labeling problems, IDEM staff emphasized the need for "good housekeeping" practices at this facility.</p>

XII.	Relevant differences from previous inspections, and additional comments:
	The facility continues to struggle with the same paperwork and container management issues that were cited in the two previous inspections.

XIII.	Permitted Facility:
	Observed permitted units are consistent with permit requirements: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If no, see Section XVII, Violation Descriptions for details.

XIV.	Pollution Prevention (P2)
	P2 opportunities may be available to help save money and reduce environmental risk/liability. You might consider having a P2 assessment, or a voluntary technical assistance consultation from IDEM staff or CMTI. Please visit the agency's P2 web site at www.in.gov/idem/oppta for additional information. The following are additional P2 suggestions that could possibly save money, reduce waste and/or minimize risk.
	None noted.

XV.	Guidance Materials Provided to Facility
	None.

XVI.	Violations. The checklist below is not comprehensive, but includes the most common violations. Checked violations and additional violations are described in detail in Section XVII and include location information, corrective measures, and compliance dates. Appropriate documentation, photographs and maps may also be attached. When appropriate, a representative portion of a facility or documents may be inspected. A description of those portions inspected is provided in Section XI, Inspection Summary.				
1) Hazardous Waste Determination 40 CFR 262.11	✓	15) Maintenance & Operation 262.34 ref 265.31	✓	29) Ignitable/Reactive Wastes 40 CFR 265.176/265.117	✓
2) Waste Storage 40 CFR 261.5(e), (f) or (g)		16) Communications & Fire (Req. Equip.) 262.34 ref 265.32		30) Inspections... Daily/Weekly (Tanks) 40 CFR 265.195	
3) Disposal/Mgt. CESQG 40 CFR 261.5 (f) or (g)		17) Testing & Maintenance (Equip.) 262.34 ref 265.33		31) Secondary Containment (Tanks) 40 CFR 265.193	
4) Generator EPA ID Number 40 CFR 262.12 & 329 IAC 3.1-1-10		18) Communication & Alarm (Access) 262.34 ref 265.34		32) SQG Tank Standards 40 CFR 265.201	
5) Manifest Requirements 329 IAC 3.1-7, 40 CFR 262.44		19) Aisle Space 262.34 ref 265.35	✓	33) Integrity assessment (Tanks) 40 CFR 265.192	
6) Land Disposal WAP 40 CFR 268.7		20) Police, Fire & Hospital Arrangements 262.34 ref 265.37	✓	34) Subpart BB/CC 40 CFR 265.1050/1080	
7) Land Disposal Notification 40 CFR 268.7		21) Employee Training (SQG) 40 CFR 262.34 (d)		35) Mixing Used Oil (w/ Haz. Waste) 329 IAC 3.1-3-1 & 2	
8) Land Disposal Certification 40 CFR 268.9		22) Response to Emergencies 40 CFR 262.34 (d)		36) Storage of Used Oil (Marking) 329 IAC 13-4-3	
9) Closed HW container 40 CFR 262.34 ref 265.173	✓	23) Annual/Biennial Report 40 CFR 262.44, IC 13-22-4-3.1		37) Release of Used Oil (response, report, repair) 329 IAC 13-4-3	
10) Container Marking & Labeling 40 CFR 262.34 (a)	✓	24) Contingency plan 262.34 ref 265.50	✓	38) Release to the Environment (Env. Impact) IC 13-30-2	✓
11) Waste Storage (90/180 days) 40 CFR 262.34 (a), (d), (e) & (f)]	✓	25) Emergency Coordinator 40 CFR 262.34 (d)		39) Solid Waste Mgmt 329-IAC-10	
12) Condition of containers 40 CFR 262.34 ref 265.171	✓	26) Personnel Training (LQG) 262.34 ref 265.16	✓	40) Permit Conditions 40 CFR 264	
13) Satellite Accumulation 40 CFR 262.34 (c)		27) Labeling/Marking (Universal Waste) 329 IAC 3.1-16	✓	41) Other (See violation descriptions)	
14) Emergency Info Posted 40 CFR 262.34 (d)		28) Storage Time (Universal Waste) 329 IAC 3.1-16			

XVII. Violation descriptions: Includes observed violations with corresponding regulatory citations and permit conditions (when applicable), corrective measures and compliance dates.	
Notes: Item numbers below do not correspond with violations listed in Section XVI. See Attachment A for details regarding container violations.	
Item 1. 40 CFR 262.11 A person who generates a solid waste must determine if that waste is a hazardous waste by the methods established in § 262.11 (a) through (d). At the time of this inspection there were thirty-six (36) containers, located throughout the facility, in which the contents were unknown. These drums were stored with other containers marked as hazardous waste. This violation was cited in February 2000 inspection report.	
Item 2. 40 CFR 262.34 (a)(2) A generator may accumulate hazardous waste in containers on-site for 90-days or less provided that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. At the time of this inspection there were forty-six (46) containers, located throughout the facility, that did not have the start-of-accumulation date clearly marked and visible for inspection. This violation was cited in February 2000 and December 1996.	

Item 3.

40 CFR 262.34 (a)(3)

A generator may accumulate hazardous waste in containers on-site for 90-days or less provided that each container is labeled or marked clearly with the words "Hazardous Waste".

At the time of this inspection there were twenty-three (23) containers that were not labeled with the words "Hazardous Waste".

This violation was cited in February 2000 and December 1996.

Item 4.

40 CFR 262.34/ 265.173 (a)

A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

At the time of this inspection there were five (5) drums containing hazardous waste that were not stored closed. Two of these were corrected during the inspection.

This violation was cited in February 2000 and December 1996.

Item 5.

40 CFR 262.34 (a) and (b)

A generator may accumulate hazardous waste on-site for 90 days or less without a permit or interim status. A generator who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to the requirements of 40 CFR parts 264 and 265 and the permit requirements of 40 CFR part 270 unless he has been granted an extension to the 90-day period.

At the time of this inspection, there were forty-nine (49) hazardous waste containers with start-of-accumulation dates indicating storage on-site for more than 90 days.

This violation was cited in February 2000 and December 1996.

Item 6.

40 CFR 262.34/ 265 subpart I

265.171

If a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements of this part.

At the time of this inspection, there were fourteen (14) hazardous waste containers that were not in good condition.

This violation was cited in February 2000 and December 1996.

Item 7.

40 CFR 262.34 (a)(4)/ 265.35

The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

At the time of this inspection, there was not adequate aisle space to allow unobstructed movement of personnel (or equipment) in the inside hazardous waste storage area.

This violation was cited in February 2000 and December 1996.

Item 8.

40 CFR 265.177 (c)

A storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device.

At the time of this inspection incompatible wastes (e.g. cyanide and acid) were being stored in close proximity without a protective barrier.

Item 9.

40 CFR 265.174

The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by other factors.

Facility representative provided documentation that weekly inspections of the container storage areas were performed. However, given the number of container violations observed at the time of this inspection, it was apparent that if the inspections were performed, they were not performed properly.

This violation was cited in February 2000. See Attachment B.

Item 10.

40 CFR 262.34 (a)(4)/ 265.37

The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at this facility and the potential need for the services of these organizations:

(1) Arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes, and other arrangements as specified in (2), (3), and (4) of this item.

At the time of this inspection, the facility had not made these arrangements or not documented that such arrangements existed.

Item 11.

40 CFR 262.34 (a)(4)/ 265.52

The contingency plan must contain the following elements:

(c) The plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to § 265.37.

(e) The plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

(f) The plan must include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.

At the time of this inspection, the contingency plan lacked all or some portions of the aforementioned items.

Item 12.

40 CFR 265.53(b)

A copy of the contingency plan and all revisions to the plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

At the time of this inspection, there was no documentation or record that the contingency plan had been submitted to the necessary response agencies/teams.

This violation was cited in February 2000.

Item 13.

40 CFR 262.34 (a)(4)/ 265.31

Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

At the time of this inspection, there was an area on the east side of the building, adjacent to a chain-link fence, where the ground was discolored and the vegetation stressed. This area was approximately five (5) feet wide and fifty (50) feet long. Facility representatives stated that approximately three months prior, a tote containing "silver strip"- nitric acid solution with silver- had leaked 10-20 gallons through a faulty valve. The contained material was put into a different tote, and absorbent used to collect the spilled material from the pavement. It is apparent, however, that the material also contaminated the adjacent ground and was not addressed in the initial clean-up.

Item 14.

40 CFR 262.34/ 265.16.

Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance...

Based on the number of violations observed during this inspection, it appears the generator does not have an adequate hazardous waste personnel training program.

Item 15.

IC 13-30-2-1

A person may not deposit any contaminants upon the land in a place and manner that creates or would create a pollution hazard that violates or would violate a rule adopted by one (1) of the boards.

At the time of this inspection, there were two (2) drums of "nickel strip" in the outside storage area that were leaking. See photographs.

Item 16.

40 CFR 273.14/ 329 IAC 3.1-16-2

A small quantity handler of universal waste must label each or mark clearly each lamp or a container or package in which such lamps are contained with the phrase "Universal Waste- Lamps" or "Waste Lamps" or "Used Lamps" or with other words that accurately identify the universal waste lamps.

At the time of this inspection, there was one (1) box of waste lamps in the Boiler Room that was not properly labeled.

Item 17.

40 CFR 266.70/ 262 Subpart B

(b)(2) Persons who generate, transport, or store recyclable materials utilized for precious metal recovery are subject to Subpart B of part 262 (for generators) and §§ 265.71 and 265.72 (for persons who store).

At the time of this inspection, the generator was not complying with 262 Subpart B (Manifest Requirements) for their various sludge wastes (e.g. silver) sent for precious metal recovery.

Item 18.

40 CFR 266.70

(d) Recyclable materials that are regulated under this subpart that are accumulated speculatively (as defined in § 261.1(c)) are subject to all applicable provisions of parts 262 through 265, 270 and 124 of this chapter.

At the time of this inspection, it appears that either the waste sludges for precious metal recovery are being accumulated speculatively or documentation to dispute this is not available.

Item 19.

327 IAC 2-6.1-5

The following spills from a facility must be reported:

(5) Any spill for which a spill response has not been done.

Per 327 IAC 2-6.1-4 (16), "spill response" means the spill is contained and free material is removed or neutralized.

A "reportable spill" is subject to the requirements listed in 327 IAC 2-6.1-7, including (but not limited to) containment, accomplishment of a spill response, and communication of a spill report.

Based on information provided at the time of this inspection, the facility failed to implement an appropriate spill response for the "silver strip" release referenced in Item 13, thus creating a reportable spill. The company then failed to comply with 327 IAC 2-6.1-7.

Violations are being referred to the Office of Enforcement. Additional violations may be cited as information becomes available.

ATTACHMENTS:

☒ **FACILITY MAP WITH LOCATION OF REGULATED WASTE ACTIVITY AND AREAS OF ENVIRONMENTAL CONCERN**

☒ **PHOTO LOG**

☒ **ADDITIONAL DOCUMENTATION:** Container inventory list, Facility's weekly inspection checklist (blank), photographs

Miller Plating and Metal Finishing
Evansville, Indiana
IND006365985
Inspection dates: November 14th and 18th, 2002

Hazardous Waste Storage- Inside – Northwest portion of room					
Qty	Type of container	Contents labeled as	Date	Comments	DOV Item Number
1	55-gallon drum	Silver Bath	8-9-02		5
1	55-gallon drum	Silver Nitric Strip	9-18-02		
1	55-gallon drum	Chrome Waste	11-4-02		
1	55-gallon drum	Phosphoric acid with ammonium bifluoride	10-9-02		
1	55-gallon drum	Strip Room Strip	11-5-02		
1	55-gallon drum	Activator Dept 710	None	Contains paladium	2
1	55-gallon drum	No label/ Unknown	None	White drum	1, 2, 3
1	55-gallon drum	Rustaway	9-16-02		
1	55-gallon drum	Nitric R&D	8-15-02		5
1	55-gallon drum	Sulfamate Nickel	9-15-02		
2	55-gallon drum	No label/ Unknown	None	Black drum	1, 2, 3
1	55-gallon drum	Dept 30 Silver Strip	8-22-02	Drum condition- collapsed	6
1	55-gallon drum	Silver Strip	8-22-02		
1	55-gallon drum	Irodite	8-16-02	Chrome	5
1	55-gallon drum	Silver Strip	8-21-02		
2	55-gallon drum	Miller Cleaner	None		2
1	55-gallon drum	Potassium Cyanide	9-6-02		
1	55-gallon drum	Activator from Dept 710	8-16-02	Paladium	5
1	55-gallon drum	Unknown	9-6-02		1
1	55-gallon drum	Bad Copper Strike	9-6-02		
1	55-gallon drum	Unknown	9-12-02	HW label illegible	1
1	55-gallon drum	No label/ Unknown	None		1, 2, 3
1	55-gallon drum	Puma	8-1-02		5
1	55-gallon drum	Puma	8-2-02		5
1	55-gallon drum	Bad Copper Strike	9-6-02		
1	55-gallon drum	Unknown	None	HW label illegible	1, 2
2	55-gallon drum	Miller Cleaner	9-20-02		

2	55-gallon drum	No label/ Unknown	None		1, 2, 3
2	55-gallon drum	Copper Strip	9-20-02		
2	55-gallon drum	No label/ Unknown	None		1, 2, 3
1	55-gallon drum	Puma w/ Copper	8-1-02		5
1	55-gallon drum	No label/ Unknown	None	Blue poly drum- collapsed	1, 2, 3, 6
1	55-gallon drum	Bad Copper Strike	9-6-02		
3	55-gallon drum	No label/ Unknown	None		1, 2, 3
1	55-gallon drum	Bad Copper Strike	9-6-02		
1	55-gallon drum	Silver Strip	9-12-02		
2	55-gallon drum	Miller Cleaner	None		2
2	55-gallon drum	Potassium Cyanide	9-6-02		
1	55-gallon drum	Copper Strip	9-20-02	Date questionable due to legibility	
1	55-gallon drum	Silver Strip	8-12-02		5
1	55-gallon drum	Silver Strip	8-22-02		
1	55-gallon drum	No label/ Unknown	None		1, 2, 3
1	55-gallon drum	Unknown	9-14-02		1
1	55-gallon drum	Nickel R&D	8-15-02		5
2	55-gallon drum	No label/ Unknown	None		1, 2, 3
2	55-gallon drum	Nitric Silver Strip	10-7-02		
1	55-gallon drum	Activator with palladium	8-16-02		5
1	55-gallon drum	Rustaway	9-16-02		
1	55-gallon drum	Chrome Waste	11-4-02		
1	55-gallon drum	No label/ Unknown	None		1, 2, 3
1	55-gallon drum	Silver nitric strip	9-18-02	Drum condition- collapsed	6
1	55-gallon drum	Chrome waste	11-4-02		

Hazardous Waste Storage- Inside- Second Row					
1	55-gallon drum	Copper Strip	8-19-02	Drum condition- swollen	5, 6
1	55-gallon drum	Copper Strip with cyanide	9-18-02		
1	55-gallon drum	Cyanide floor spill	11-5-02		
1	55-gallon drum	Unknown	None	HW label illegible	1, 2
1	55-gallon drum	Irodite	8-15-02		5
1	55-gallon drum	Strip Room Strip	11-5-02		

1	275-gallon tote	Nitric with Silver Strip	2-1-02		5
1	275-gallon tote	Unknown	None	1/3 full, \approx 90 gallons, HW label crossed out	1, 2, 3
1	275-gallon tote	Chrome waste	8-21-02		
1	275-gallon tote	Chrome waste	8-23-02	Container condition- leaking	6
2	275-gallon tote	Copper waste	8-21-02		
2	275-gallon tote	Copper waste	8-28-02		
1	275-gallon tote	Copper waste	8-25-02		
1	275-gallon tote	Chrome waste	8-15-02		5
2	55-gallon drum	Copper Strike	8-5-02		5
1	55-gallon drum	Copper bath 99.8%	9-2-02		
1	30-gallon drum	Boric acid powder	8-6-02		5
1	55-gallon drum	No label/ Unknown	None	Mnfr label- "Nickel Sulfate Solution"	1, 2, 3
2	55-gallon drum	No label/ Unknown	None		1, 2, 3

Hazardous Waste Storage- Inside- Southwest portion of room- Second Row					
1	55-gallon drum	Floor Spill cyanide and nickel	9-3-02		
1	55-gallon drum	Floor Spill cyanide and nickel	9-23-02		
1	55-gallon drum	Copper Strike	11-6-02		
2	55-gallon drum	Silver Plate Out	11-5-02		
1	55-gallon drum	Caustic with copper	11-6-02		
2	55-gallon drum	Dye Cast Conditioner	9-7-02		
2	55-gallon drum	Copper Waste	11-6-02		
1	55-gallon drum	Blue Dye Washout	11-5-02		
1	55-gallon drum	E Coat paint	11-6-02		
3	55-gallon drum	Silver Solution	11-5-02		
1	55-gallon drum	Silver Solution	11-5-02	Drum condition- collapsed	6
6	55-gallon drum	Silver Solution	11-5-02		
8	55-gallon drum	Silver Solution	11-5-02		
1	55-gallon drum	E Coat paint	11-6-02		
1	55-gallon drum	Blue Dye Washout with cyanide	11-5-02		
1	55-gallon drum	Silver Solution	11-5-02		
2	55-gallon drum	Dye Cast Conditioner	9-7-02		

1	55-gallon drum	Copper bath	9-11-02		
1	55-gallon drum	Strip Room Strip	11-5-02		
1	55-gallon drum	Dye Cast Conditioner with cyanide	8-15-02		5
1	55-gallon drum	Unknown	None	HW Label present	1, 2
1	55-gallon drum	Dye Cast Conditioner with cyanide	8-15-02		5
1	55-gallon drum	Bright Nickel	8-11-02		5
1	55-gallon drum	No label/ Unknown	None		1, 2, 3
1	55-gallon drum	Chrome Brite Dip	8-18-02		5
1	55-gallon drum	Chrome Brite Dip	8-21-02		
1	55-gallon drum	Chrome Brite Dip	8-8-02		5
2	55-gallon drum	Dye Cast Conditioner with cyanide	8-15-02		5
2	55-gallon drum	E-coat R&D	8-25-02		
1	55-gallon drum	Irodite Chrome	9-8-02		
1	55-gallon drum	Chromate Irodite	9-8-02		
1	55-gallon drum	Silver Strip	11-5-02		
1	55-gallon drum	Strip Room Strip	11-5-02		
2	55-gallon drum	Cyanide floor Spill	11-5-02		
1	55-gallon drum	Copper Strip with cyanide	9-7-02	Drum condition- swollen	6
1	55-gallon drum	Silver strip	None	Drum condition- swollen Label difficult to read	2, 6

Hazardous Waste Storage- Inside- Third Row					
1	55-gallon drum	Miller Cleaner	8-1-02		5
1	55-gallon drum	Miller Cleaner	8-1-02	Drum condition- collapsed	5, 6
1	55-gallon drum	Puma	5-1-02	Date could be 6-1-02	5
2	55-gallon drum	Chrome waste	8-25-02		
1	55-gallon drum	Chrome waste	8-25-02	Drum condition- collapsed	6
1	55-gallon drum	No label/ Unknown	None	Unlabeled and open	1, 2, 3, 4

Hazardous Waste Storage- Inside- Southwest portion of room					
1	300-gallon tote	Zincate	None	HW label, no legible date	2
1	275-gallon tote	Copper bath/Copper Strike	9-18-02	HW label, "HW" cut off	
1	350-gallon tote	Chrome waste	9-15-02		

1	55-gallon drum	Copper Strike	11-6-02		
1	55-gallon drum	Copper Waste	11-6-02		
1	55-gallon drum	Silver Plate out	11-5-02		
1	55-gallon drum	Copper waste	11-5-02		
1	55-gallon drum	Copper strike	11-8-02		
2	55-gallon drum	Nitric with bifluoride	11-5-02		

Outside- East Side of Building					
17	55-gallon drum	Empty			
1	275-gallon tote	Zincate	11-15-02		
7	275-gallon tote	Empty			
1	Poly tank	Empty			

Outside- South End of Lot					
1	55-gallon drum	Miller Cleaner	8-1-02		5

Outside- South End of Lot- First Row					
1	55-gallon drum	Unknown	None	Green poly drum	1, 2, 3
1	55-gallon drum	Dye Cast Conditioner	6-20-02	Date could be 8-20-02	2, 5
6	55-gallon drum	Dye Cast Conditioner	8-20-02		5

Outside- South End of Lot- Second Row					
4	55-gallon drum	Copper Bath	8-21-02		
4	55-gallon drum	Copper Bath	8-3-02		5

Outside- South End of Lot- Third Row					
2	55-gallon drum	Sodium Cyanide with benzene strip	9-4-02		
1	55-gallon drum	Sodium Strip with benzene	9-10-02		
1	55-gallon drum	Copper Strip with benzene	9-10-02		
2	55-gallon drum	Sodium cyanide with benzene	8-28-02		
2	55-gallon drum	Sodium cyanide with benzene	8-23-02		
2	55-gallon drum	Copper Strip	None		2

2	55-gallon drum	Cyanide benzene strip	9-26-02		
2	55-gallon drum	Copper Strip	None		2
1	55-gallon drum	Potassium cyanide	8-1-02		5
1	55-gallon drum	Potassium cyanide	8-1-02	Drum condition- collapsed	5, 6
1	55-gallon drum	Unknown	8-14-02	HW label- contents illegible	1, 5
1	55-gallon drum	Unknown	9-19-02	HW label- contents illegible	1
1	55-gallon drum	Potassium cyanide	10-1-02		
1	55-gallon drum	Potassium cyanide	8-7-02	Date is illegible	2
2	55-gallon drum	Strip Dept 80	9-18-02	Drum condition- collapsed	6
2	55-gallon drum	Copper Strip	9-19-02		
2	55-gallon drum	Copper Strip Dept 80 Sodium cyanide & benzene	10-15-02		
2	55-gallon drum	Copper Strip Dept 80	10-8-02		
2	55-gallon drum	Copper Strip	10-28-02		
2	55-gallon drum	Copper Strip	11-4-02		
2	55-gallon drum	Copper Strip	11-14-02		
2	55-gallon drum	Copper Strip	11-14-02		
2	55-gallon drum	Copper Strip	11-4-02		
2	55-gallon drum	Copper Strip	10-28-02		
2	55-gallon drum	Copper Strip	10-15-02		
2	55-gallon drum	Copper Strip	10-8-02		
1	55-gallon drum	Unknown	9-28-02		1
2	55-gallon drum	Strip line 80	9-18-02		
2	55-gallon drum	Potassium cyanide	8-1-02		5
2	55-gallon drum	Copper Strip	9-1-02		
2	55-gallon drum	Copper Strip	None		2
1	55-gallon drum	Copper Strip	8-28-02		
1	55-gallon drum	Copper Strip	8-28-02	Drum condition- collapsed	6
2	55-gallon drum	Copper Strip	8-23-02		
2	55-gallon drum	Copper Strip	9-10-02		
2	55-gallon drum	Copper Strip	9-4-02		

Outside- South End of Lot- Fourth Row					
5	275-gallon tote	Nickel Strip	NA	Non-hazardous	
51	55-gallon drum	Nickel Strip	NA	2 drums leaking, ≈ 4 other drums collapsed	13

Outside- East of Office Building					
1	20-yd ³ roll-off	Sludge	11-11-02		

Warehouse					
1	55-gallon drum	Zincate Dept 30	11-16-02		

Outside- Maintenance Shop					
4	55-gallon drum	No labels	None	Believed to be sludge for silver reclamation	

Outside- Chemical Warehouse					
1	55-gallon drum	Nickel Dept 40 waste	4-4-01		5
2	55-gallon drum	Unknown	None		1, 2
2	55-gallon drum	Unknown	None	Open	1, 2, 4
24	55-gallon drum	Contain product or empty			

Chemical Warehouse					
1	55-gallon drum	Gold solution	3-13-00	Possibly usable material, stored with HW label	5
1	55-gallon drum	Chrome vet	5-5-00		5

Wastewater Treatment Area					
1	55-gallon drum	Copper Solution F006	1-28-02	Contains ≈ 10 gallons	5
1	55-gallon drum	Nickel from spill	None	Contains ≈ 7 gallons	2
2	55-gallon drum	Nitrobenzene Strip F006	4-14-02	≈ ¾ full and ½ full. Open on 11-14. On 11-18, in different drums, closed, labeled with same info.	4, 5
4	55-gallon drum	Silver Sludge	None		

Notes: This inventory reflects the November 18th portion of the inspection. Some containers had been moved in the elapsed time between visits.

As of November 18th, anything dated 8-20-02 or earlier exceeds the 90-day limit.

Hazardous Waste Weekly Inspection

Name: _____

Date: _____

Dumpster

- _____ Ensure a Hazardous waste sticker is visible and filled out correctly including date.
- _____ Ensure lid is closed on dumpster.
- _____ Ensure container is in good order and is not leaking.
- _____ Ensure there is no waste on the ground.

Sludge Cart

- _____ Ensure a hazardous waste sticker is visible and legible.
- _____ Ensure in good condition.

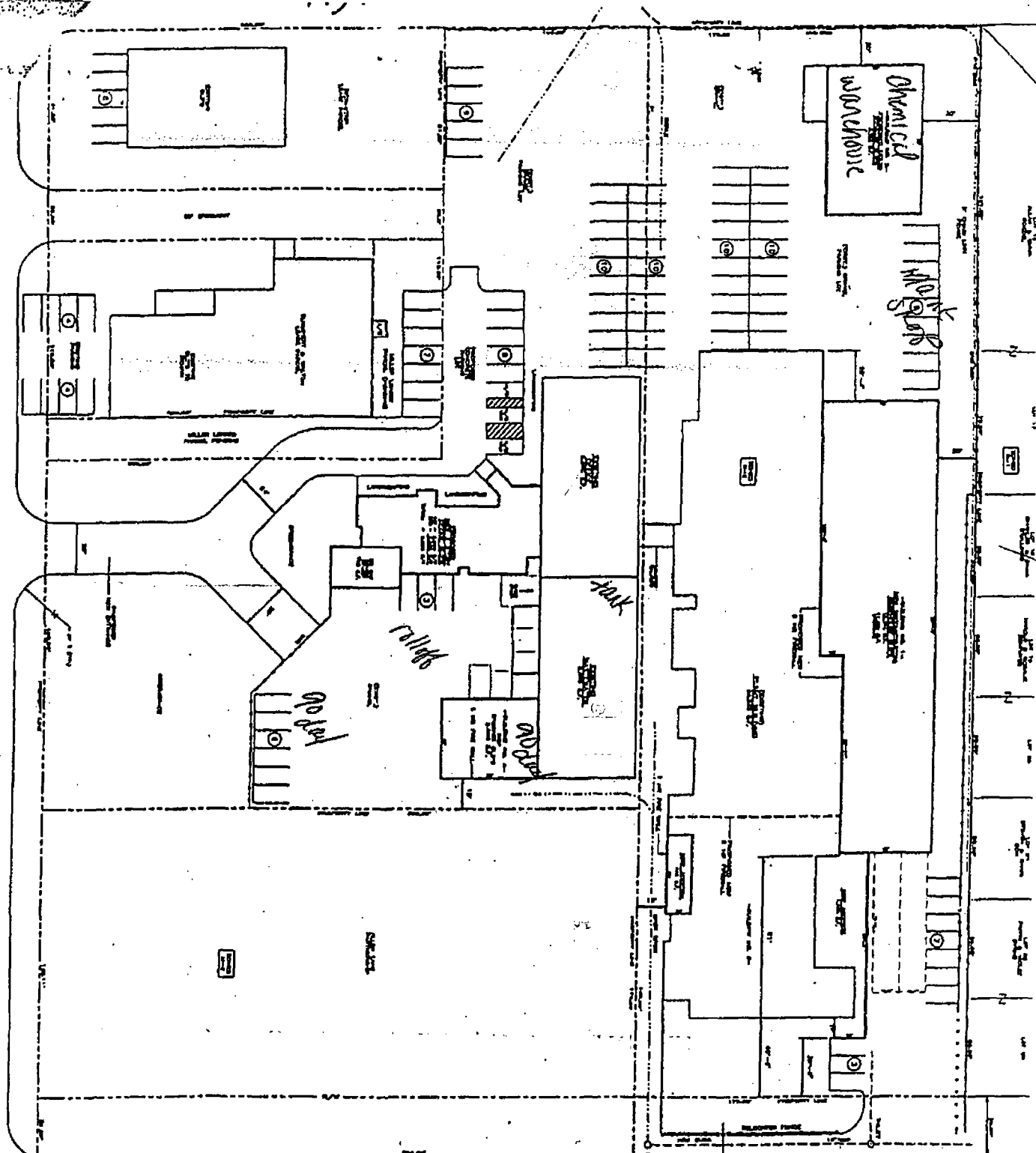
Sludge Dryer

- _____ Ensure a hazardous waste sticker is visible and legible.
- _____ Ensure area around dryer is free of any waste.

90 Day Area

- _____ Ensure all containers are in good repair. No leaks, spills, etc.
- _____ Ensure adequate aisle space.
- _____ Ensure all containers are labeled properly
- _____ Ensure all containers are within the 90 day limit.

Comments:



MURDER AVENUE

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• Mar. 14	
• Apr. 14	
• May 14	
• Jun. 14	
• Jul. 14	
• Aug. 14	
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• Oct. 14	
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**Indiana Department of Environmental Management
VERIFICATION OF INSPECTION**

This is to verify that on Nov 14, 2002 an inspection of Miller Blahny Metal Knitting Inc was conducted by the undersigned representative of the Indiana Department of Environmental Management, Office of Land Quality.

Type of Inspection (may include more than one):

Inspection Industrial Waste Compliance _____ Complaint
 _____ Multi-Media Screening Evaluation
 _____ Other _____

Preliminary Inspection/Screening Findings

*These findings are considered preliminary and include specific matters discovered during the inspection that the designated agent of the department believes may be a violation of law or a permit issued by the department.

Single Media Inspection:

- _____ No violations were discovered with respect to the particular items observed during the inspection.
 _____ Potential violations were discovered but corrected during the inspection.
 _____ Potential violations were discovered and require a submittal and/or follow-up inspection.
 _____ Potential violations were discovered and may be referred to our Office of Enforcement.
☒ Additional information/review is required to evaluate overall compliance.
 _____ Other/Comments (attachment may be included) _____

Multi-Media Screening (please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):

- ☒ Multi-Media Screening not conducted.
 _____ Potential problems or potential violations were discovered but corrected during the inspection.
 _____ Potential problems or potential violations were discovered and will be referred to the Office(s) of _____ for further investigation and response.

Pollution Prevention:

Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote changes in business and commercial operation, especially manufacturing processes, so that less environmental wastes are generated. Your participation in Indiana's pollution prevention program is entirely voluntary. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance? _____ Yes ☒ No

If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance at 317/233-5627 or 1-800/988-7901 or visit their Web site at <http://www.IN.gov/idem/oppta/p2/>.

A summary of violations and concerns noted during the inspection were verbally communicated to the undersigned representative during the inspection. The facility should correct any deficiencies noted as soon as possible. Corrections made and verified during the inspection may still be cited as violations.

☒ Written inspection summary will be provided within 45 days. _____ Written report provided at the conclusion of the inspection.

IDEM Representative:

Printed Name	Signature	Phone Number	Date	Time
Susan Lowry	<i>Susan Lowry</i>	317-3083117	11-14-02	In: 2:00 Out: 4:50

Owner/Agent Representative:

Printed Name	Signature	Title	Phone Number	Date
DANNY ERVIN	<i>Danny Ervin</i>	H-R	812 424-3837	11-14-02

**Indian Department of Environmental Management
VERIFICATION OF INSPECTION**

This is to verify that on Nov 18, 2002 an inspection of Miller Plating - Metal Finishing was conducted by the undersigned representative of the Indiana Department of Environmental Management, Office of Lead Quality.

Type of Inspection (may include more than one):

Industrial Waste Compliance

☐ Complaint
☐ Multi-Media Screening Evaluation
☐ Other _____

Preliminary Inspection/Screening Findings

*These findings are considered preliminary and include specific matters discovered during the inspection that the designated agent of the department believes may be a violation of law or a permit issued by the department.

Single Media Inspection:

- ☐ No violations were discovered with respect to the particular items observed during the inspection.
☐ Potential violations were discovered but corrected during the inspection.
☐ Potential violations were discovered and require a submittal and/or follow-up inspection.
☐ Potential violations were discovered and may be referred to our Office of Enforcement.
☒ Additional information/review is required to evaluate overall compliance.
☐ Other/Comments (attachment may be included) _____

Multi-Media Screening (please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):

- ☒ Multi-Media Screening not conducted.
☐ Potential problems or potential violations were discovered but corrected during the inspection.
☐ Potential problems or potential violations were discovered and will be referred to the Office(s) of _____ for further investigation and response.

Pollution Prevention:

Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote changes in business and commercial operation, especially manufacturing processes, so that less environmental wastes are generated. Your participation in Indiana's pollution prevention program is entirely voluntary. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance? ☐ Yes ☐ No

If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance at 317/233-5627 or 1-800/988-7901 or visit their Web site at <http://www.IN.gov/idem/oppta/p2/>.

A summary of violations and concerns noted during the inspection were verbally communicated to the undersigned representative during the inspection. The facility should correct any deficiencies noted as soon as possible. Corrections made and verified during the inspection may still be cited as violations.

- ☒ Written inspection summary will be provided within 45 days. ☐ Written report provided at the conclusion of the inspection.

IDEM Representative:

Printed Name	Signature	Phone Number	Date	Time
Susan Lowry	<i>[Signature]</i>	317-308-3117	11-18-02	In: 9:45 am Out: 4:30 pm

Owner/Agent Representative:

Printed Name	Signature	Title	Phone Number	Date
Mike Smith	<i>[Signature]</i>	Envir. Mgr.	812-424-7837	11-18-02